| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8   | Malani L. Kotchka Nevada Bar No. 0283 mkotchka@lionelsawyer.com LIONEL SAWYER & COLLINS 1700 Bank of America Plaza 300 South Fourth Street Las Vegas, Nevada 89101 (702) 383-8888 (Telephone) (702) 383-8845 (Fax)  Attorneys for Defendant Quality Communications, Inc. |                                  |
|--|--|----------------------------------|
| 9  | UNITED STATES DISTRICT COURT   |                                  |
| 10   | DISTRICT OF NEVADA   |                                  |
| 11   | JOSEPH VALDEZ, individually,   | )                                |
| 12   | Plaintiff,   | )                                |
| 13   | v.   | ) Case No. 2:09-cv-01797-PMP-NJK |
| 14   |  | )<br>) MOTION TO REDUCE COSTS    |
| 15   | COX COMMUNICATIONS LAS VEGAS, INC., VIDEO INTERNET   | ) AWARD TO JUDGMENT AGAINST      |
| 16   | PHONE INSTALLS, INC., QUALITY COMMUNICATIONS, INC., and  | ) VALDEZ<br>)                    |
| 17   | SIERRA COMMUNICATIONS, CO.,  | )                                |
| 18   | Defendants.  |                                  |
| 19   |  | )                                |
| 20   |  | )                                |
| 21   | Pursuant to FRCP 69, defendant Quality Communications, Inc. requests that this Court   |                                  |
| 22   | issue a judgment for the costs award in the amount of \$1,459.30 against Plaintiff-Appellant   |                                  |
| 23   | 1/1  |                                  |
| 24   | 111  |                                  |
| 25   |  |                                  |
| 26   | ///  |                                  |
| 27   | 111  |                                  |
| 28 LIONEL SAWYER & COLLINS ATTORNEYS AT LAW 1700 BANK OF AMERICA PLAZA 300 SOUTH FOURTH ST. LAS VECAS, NEVADA 89101 (702) 383-8888 |  | Dockets.Justia.                  |

| 1   | Joseph Valdez. This motion is based on the attached memorandum of points and authorities.  |  |  |
|-----|--|--|--|
| 2   | Respectfully submitted,  |  |  |
| 3   | LIONEL SAWYER & COLLINS  |  |  |
| 4   |  |  |  |
| 5   | By: /s/ Malani L. Kotchka  Malani L. Kotchka   |  |  |
| 6   | 1700 Bank of America Plaza 300 South Fourth Street   |  |  |
| 7   | Las Vegas, Nevada 89101  |  |  |
| 8   | Attorneys for Defendant<br>Quality Communications, Inc.                                    |  |  |
| 9   |  |  |  |
| 10  | MEMORANDUM OF POINTS AND AUTHORITIES   |  |  |
| 1 1 | On March 4, 2014, this Court ordered that costs were taxed against appellant               |  |  |
| 12  | Joseph Valdez in the amount of \$1,459.30. Exhibit A. Valdez's counsel Leon Greenberg has  |  |  |
| 13  | indicated that Valdez will not pay the costs voluntarily. Therefore, defendant Quality     |  |  |
| 14  | Communications, Inc. respectfully requests that this Court enter a judgment against Joseph |  |  |
| 15  | Valdez in the amount of \$1,459.30. Upon receipt of the judgment, defendant Quality        |  |  |
| 16  |  |  |  |
| 17  | Communications, Inc. will be able to obtain a writ of execution.                           |  |  |
| 18  | Respectfully submitted,  |  |  |
| 19  | LIONEL SAWYER & COLLINS  |  |  |
| 20  | Dougle/Malari I. Matahira  |  |  |
| 21  | By: <u>/s/ Malani L. Kotchka</u><br>Malani L. Kotchka                                      |  |  |
| 22  | 1700 Bank of America Plaza 300 South Fourth Street   |  |  |
| 23  | Las Vegas, Nevada 89101  |  |  |
| 24  | Attorneys for Defendant<br>Quality Communications, Inc.                                    |  |  |
| 25  | IT IS SO ORDERED.  |  |  |
| 26  |  |  |  |
| 27  | This m. On   |  |  |
| 28  | Janjo 11. Mil  |  |  |

28
LIONEL SAWYER
& COLLINS
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PHILIP M. PRO, U.S. District Judge Dated: December 4, 2014

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